DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

MAY 17 2006

CERTIFIED MAIL 7004 1160 0000 3793 6047

Mr. Chris Jean
Slidell Landfill, L.L.C.
310 Howze Beach Road
Slidell, LA 70461

RE: Notice of Technical Completeness
Slidell Landfill, L.L.C.
Type III C/D Permit Modification Application
AI #6054 / D-103-2721 / P-0345 / PER 20040001
St. Tammany Parish

Dear Mr. Jean:

The Water and Waste Permits Division is in receipt of final copies of your submittal dated April 19, 2006. After review of this submittal, it has been determined that your permit modification application is technically complete and ready for public review. This request proposes to expand the available airspace in a vertical direction, by combining the old landfill with permitted cell numbers 1 and 2 to the north. Horizontal expansion will be limited to approximately two (2) acres on the southwesterly side of cell number 2.

The Environmental Assistance Division will distribute copies of your application for public review and place public notices in the appropriate newspapers in accordance with LAC 33:VII.513.F.3. Please contact Ms. Soumaya Ghosn at (225) 219-3276 for the date of publication and the dates for the comment period. At the conclusion of the comment period, the Water and Waste Permits Division will consider all comments and a decision will be made regarding your modification.

Please reference Agency Interest Number (AI 6054), Site Identification Number (D-103-2721), Permit Number (P-0345), and Permit Activity Number (PER20040001) on all future correspondence pertaining to this modification. If you have any questions concerning this matter, please contact Kelley Templet of the Solid and Hazardous Waste Permits Section at (225) 219-3068.

Sincerely,

Lenny M. Young

Lenny Young
Administrator
Water and Waste Permits Division

kt

c: Steve Burnham, Engineering Associates, Inc.

ENVIRONMENTAL **SERVICES**
: PO BOX 4313, BATON ROUGE, LA 70821-4313
P:225-219-3181 F:225-219-3309
WWW.DEQ.LOUISIANA.GOV

ENGINEERING
ASSOCIATES, INC.
CONSULTING ENGINEERS
CIVIL • ENVIRONMENTAL • LAND SURVEYING

LDEQ RECEIPT
6 APR 19 P1:38

original to IOSW
copy to SWG3 OReal

April 19, 2006

Project No. 23106

Dr. Chuck Carr Brown
Louisiana Department of Environmental Quality
P.O. Box 4314
Baton Rouge, LA 70821-4314

MAIN FILE

Permit Modifications Request
Slidell Landfill (Type III C&D)
310 Howze Beach Road
Slidell, Louisiana
D-103-2721/P-0345/AI No. 6054

Dear Dr. Brown:

Submitted herewith please find six copies of a Major Permit Modifications Application for the captioned site dated October, 2004 and revised April, 2006. The comments recently provided by your staff have been incorporated into the Application. This submittal is on behalf of our client, Slidell Landfill, L.L.C.

We appreciate your assistance in this matter. Should you or your staff have any questions or require additional information, please give us a call.

Sincerely,

ENGINEERING ASSOCIATES, INC.

Stephen J. Burnham, P.E.
President

SJB:dbc

c w/encl Mr. Chris Jean, Slidell Landfill, L.L.C.

RECEIVED
APR 19 2006
LDEQ

1415 DELPLAZA DRIVE • SUITE B • BATON ROUGE, LOUISIANA 70815 • TELEPHONE: (225) 926-2025 • FACSIMILE: (225) 926-2033

MAIN FILE

MAJOR PERMIT MODIFICATIONS APPLICATION FOR TYPE III CONSTRUCTION/DEMOLITION DEBRIS LANDFILL

AT

Slidell Landfill, LLC
(Formerly Johnny F. Smith Truck and Dragline Service)
310 Howze Beach Lane
Slidell, Louisiana (St. Tammany Parish)

Prepared For:

Slidell Landfill, LLC
(Formerly Johnny F. Smith Truck and Dragline Service)
310 Howze Beach Lane
Slidell, Louisiana 70461

Prepared By:

Engineering Associates, Inc.
1415 Delplaza Drive, Suite B
Baton Rouge, Louisiana

And

Network Environmental Services
P.O. Box 80794
Baton Rouge, Louisiana 70895

October, 2004
(Revised April, 2006)

ENGINEERING ASSOCIATES, INC.
CONSULTING ENGINEERS

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SLIDELL LANDFILL, L.L.C.
TECHNICALLY COMPLETE SOLID WASTE PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, has determined that a Permit Modification Application and Environmental Assessment Statement for Slidell Landfill, L.L.C., 310 Howze Beach Lane, Slidell, Louisiana, 70461 for the Slidell Landfill is technically complete and acceptable for public review. **The facility is located at 310 Howze Beach Lane, Slidell, St. Tammany Parish.**

Slidell Landfill, L.L.C. proposes to expand in a vertical and horizontal direction. The horizontal expansion will be limited to approximately two (2) acres..

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Wednesday, July 5, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit modification application and the environmental assessment statement are available for review at the LDEQ Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Additional copies may be reviewed at the St. Tammany Parish Library - Slidell Branch located at 555 Robert Boulevard, Slidell LA 70458, the St. Tammany Parish Council, located at 21490 Koop Dr., Mandeville, LA 70471 and LDEQ Southeast Regional Office, 645 N. Lotus Drive, Suite C, Mandeville LA 70471.

Inquiries or requests for additional information regarding this permit action should be directed to Kelley Templet, LDEQ, Water & Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3068.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at maillistrequest@ldeq.org or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to general information from the technically complete solid waste permit application can be viewed at the LDEQ permits public notice webpage at www.deq.state.la.us/news/PubNotice/ and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 6054, Permit Number P-0345, and Activity Number PER20040001.

Publication Date: Wednesday, May 31, 2006

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01/17/06

Table of Contents

List of Exhibits

Exhibit 1 - LRRDA Letter
Exhibit 2 - Zoning Letter
Exhibit 3 - Copies of Public Notice
Exhibit 4 - Legal Authority Proof
Exhibit 5 - Vicinity Map
Exhibit 6 - Location Map
Exhibit 7 - Highways Map
Exhibit 8 - Census Information and Maps
Exhibit 9 - FEMA Map, Letter from Corps of Engineers, and March 7, 2006 correspondence with e-mail approval by Corps of Engineers
Exhibit 10 - Traffic (LDOTD Letter)
Exhibit 11 - State of Louisiana Department of Culture, Recreation and Tourism, Office of Culture Development (Archeological Sites)
Exhibit 12 - State of Louisiana Department of Wildlife and Fisheries
Exhibit 13 - State of Louisiana Department of Culture, Recreation and Tourism, Office of Outdoor Recreation
Exhibit 14 - Existing Site Plan Layout and Site Survey
Exhibit 15 - Proposed Site Plan Layout
Exhibit 16 - Fire Station and Medical Center Location Map
Exhibit 17 - Fire and Safety Plan and Map Showing Evacuation Routes and Fire Extinguisher Locations
Exhibit 18 - Supporting Documentation for Average Bulk Density
Exhibit 19 - Example Load Ticket, Rejected Load Journal, Daily Ticket Report, and Miscellaneous Forms
Exhibit 20 - Water Discharge Permit LA 0105465
Exhibit 21 - Proposed Final Site Plan Layout Map
Exhibit 21B - Proposed Final Site Plan Layout Cross Sections
Exhibit 22 - Aquifer Map
Exhibit 23 - Summary of Geotechnical Investigations
Exhibit 24 - Certification
Exhibit 25 - Solid Waste Disposer Annual Report and Solid Waste Operator Certification
Exhibit 26 - Solid Waste Handling Procedures and Employee Training Program
Exhibit 27 - Flow Chart
Exhibit 28 - NorthShore Medical Center and Local Fire Department Letters
Exhibit 29 - Estimated Closure Costs
Exhibit 30 - Conveyance Record Document
Exhibit 31 - Estimated Post Closure Costs
Exhibit 32 - Authorization to Occupy Property
Exhibit 33 - Insurance Information
Exhibit 34 - Letter of Credit
Exhibit 35 - Aerial Photograph Showing One-Mile Radius
Exhibit 36 - Geotechnical Investigation Report by Soil Testing Engineers, Inc.
Exhibit 37 - Response to LAC 33:VII.523 (IT Questions)

SECTION 1
TRANSMITTAL LETTER
INTRODUCTION

INTRODUCTION

Slidell Landfill (formerly Johnny F. Smith Truck & Dragline Service, Inc.) is a permitted Type III Construction and Debris landfill. The landfill is divided into two distinct cells, cell no. 1 and cell no. 2, as shown on Exhibit 21. Cell nos. 1 and 2 were permitted by the Louisiana Department of Environmental Quality on September 26, 2000 (Permit No. P-0345). The old Slidell Landfill, previously known as the Johnny Smith Landfill, is located contiguous to and south of cell no. 2. The old landfill is approximately 20 acres in size and shares a common boundary with cell no. 2 of the Slidell Landfill.

The Old Slidell Landfill previously operated as a Type III landfill and is under an "Order to Close" issued by the Louisiana Department of Environmental Quality (No. 0246-A-2). Rather than close the old landfill, Slidell Landfill, L.L.C. proposes to combine the old landfill with permitted cell nos. 1 and 2 to the north. The combination of the landfill footprints will increase the available airspace in a vertical direction. Horizontal expansion of the existing landfill will be limited to the addition of approximately 2 acres on the southwesterly side of cell no.2. The requested increase in the capacity of the facility has been determined to be necessary as a result of assessment of the needs of the community and due to the accelerated growth rate of the North Shore Area. This need has been drastically increased by the recent passings of Hurricanes Rita and Katrina. A plan view of the proposed combined landfill is shown on Exhibit 21. Final proposed grades for the combined landfill as well as existing elevations at the site are also shown on Exhibit 21.

As shown on Exhibit 21, side slopes of 3 horizontal to 1 vertical are proposed. A 4% slope will be provided at the crown of the landfill to facilitate maintenance activities and to minimize surface erosion, and a minimum buffer zone of 50 feet will be maintained on all sides of the landfill. Terraces 20 feet in width have also been incorporated into the landfill design in order to minimize erosion potential. Surface water from the proposed combined landfill will be routed through existing outfall 002 as approved in the existing storm water permit for the site. Should any additional outfall locations be required, they will be permitted through the Department in accordance with applicable regulations.

Based upon the proposed modifications described above, changes to sections of the original permit narrative are applicable. The proposed changes are identified in Part I of the permit modification as ***BOLD, ITALICIZED AND HIGHLIGHTED TYPE*** . The proposed changes are identified in the remainder of the permit modification request as ***NEW RESPONSE*** in ***BOLD, ITALICIZED AND HIGHLIGHTED TYPE.*** A ***NEW RESPONSE*** is only included in the sections that required changes. Additionally, modified exhibits are included in the exhibit sections of this permit modification as applicable, and any exhibits that reference Johnny F. Smith Landfill Truck and Dragline Service, Inc. are hereby confirmed to be applicable to Slidell Landfill, L.L.C. Lastly, revisions to the text that were limited to a change from Johnny F. Smith Truck and Dragline Service, Inc. to Slidell Landfill, L.L.C. have been highlighted but are not denoted as a ***NEW RESPONSE***.

This application was prepared for Slidell Landfill, L.L.C., by Engineering Associates, 1415 Delplaza Drive, Ste B., Baton Rouge, Louisiana 70815, (225) 926-2025, Fax (225) 926-2033.

SECTION 2
PART I-PERMIT APPLICATION

SOLID WASTE STANDARD PERMIT APPLICATION-PART I

(The form shall be completed in accordance with the instructions found in LAC 33:VII.513.A.1)

A. Application (Prospective Permit Holder): *Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service, Inc.)*

B. Facility Name: *Slidell Landfill (formerly Johnny F. Smith Truck & Dragline Service, Inc.)*

C. Facility Location/Description: (identify by street and number or intersection of roads, or by mileage and direction from an intersection) ***310 Howze Beach Road***

D. Geographic Location: ***Sections 26 and 44, Township 9 South, Range 14 East***

Parish: ***St. Tammany Parish***

Coordinates (at the center of the facility):

Latitude: ***Degrees 30 Minutes 14 Seconds 45***

Longitude: ***Degrees 89 Minutes 45 Seconds 56***

E. Mailing Address (of the application): ***310 Howze Beach Road***
Slidell, Louisiana 70461

F. Contact Person for the Applicant: *Harold McCain*

G. Telephone Number (of the contact person): ***(985) 641-7330***

H. Type and Purpose of Operation: (check each applicable line)

Type I	Industrial Landfill	*N/A*
	Industrial Surface Impoundment	*N/A*
	Industrial Landfarm	*N/A*
Type I-A	Industrial Incinerator Waste Handling Facility	*N/A*
	Industrial Shredder/Compactor/Baler	*N/A*
	Industrial Transfer Station	*N/A*

	Type II	Sanitary Landfill	*N/A*
		Residential/Commercial Surface Impoundment	*N/A*
		Residential Commercial Landfarm	*N/A*
	Type II-A	Residential/Commercial Incinerator Waste Handling Facility	*N/A*
		Residential/Commercial Shredder/Compactor/Baler	*N/A*
		Residential/Commercial Transfer Station	*N/A*
		Residential/Commercial Refuse-derived Fuel	*N/A*
	Type III	Construction/Demolition-debris landfill	*X*
		Woodwaste Landfill	*X*
		Compost Facility	*N/A*
		Resource Recovery/Recycling Facility	*N/A*
	Other	Describe:	*N/A*

I. Site Status: Owned *X* Leased _____ Lease Term _____
Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service Inc.), Property Owner
(Note: If leased, provide copy of lease agreement) See Exhibit 32

J. Operation Status: Existing X Proposed _____

K. Total Acres *48* Processing Acres *0* Disposal Acres *Cell 1: ±9 Acres*
Cell 2: ±18.5 Acres
Old Landfill Cell: ±20.5 Acres

L. Environmental Permits: (List permits that relate directly to the facility).

LDEQ Water Discharge Permit: LA 0105465
LDEQ Solid Waste Permit: P-0345

M. Conformity with Statewide Plans. Attach letter from the Louisiana Resource Recovery and Development Authority (LRRDA) stating the facility is an acceptable part of the state-wide program (**EXHIBIT 1**-*Please note that LRRDA no longer exists, however, correspondence previously acquired from LRRDA has been included as Exhibit 1*).

(Note: In accordance with R.S. 30:2307.B, LRRDA authority does not apply to solid waste disposal activity occurring entirely within the boundaries of a plant, industry or business which generates such solid waste.)

N. Zoned: Yes __X__ No _____ Zoning Requested _____

Zone Classification: ***M-2 Intermediate Industrial District***
(Note: If zoned, include affidavit and/or other documentation stating the proposed use does not violate existing land-use requirements.) (**EXHIBIT 2**).

O. Types, Quantities, and Sources of Waste (tons per week)

	Processing		Disposal	
	On-site	Off-site	On-site	Off-site
Residential	*N/A*	*N/A*	*N/A*	*5,000 tpw**
Industrial	*N/A*	*N/A*	*N/A*	*N/A*
Commercial	*N/A*	*N/A*	*N/A*	*20,000 tpw**
OTHER	*N/A*	*N/A*	*N/A*	*N/A*

P. Service Area:

List of Parishes:

Statewide _____ Unlimited ___*X*___

Q. Proof of Operator's Public Notice-Attach proof of publication of the notice regarding the permit application submittal as required by LAC 33:VII.513.A. (**EXHIBIT 3**).

- *Reference to residential or commercial waste applies only to the source of Type III landfill waste. Only those wastes acceptable for disposal in Type III Construction and Demolition Debris Landfills will be accepted/disposed of.*

Due to the recent passing of Hurricanes Rita and Katrina, the volume of incoming waste to Slidell Landfill has increased significantly. Maximum anticipated weekly tonnage has been included above, however, decreases in the weekly tonnage would be expected to occur over time.

R. Certification: I have personally examined and am familiar with the information submitted in the attached document, and I hereby certify under penalty of law that this information is true, accurate, and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

Signature _____

Date: 11/30/04

Harold McCain, Facility Manager

(See Attached proof of the legal authority of the signee to sign for the applicant.)
(EXHIBIT 4)

SECTION 3
PART II PERMIT APPLICATION

LOCATION CHARACTERISTICS
FACILITY CHARACTERISTICS
FACILITY SURFACE HYDROLOGY
FACILITY GEOLOGY
FACILITY SUBSURFACE HYDROLOGY
FACILITY PLANS AND SPECIFICATIONS
FACILITY ADMINISTRATIVE PROCEDURES
FACILITY OPERATIONAL PLANS
IMPLEMENTATION PLAN
FACILITY CLOSURE
FACILITY POST-CLOSURE
FINANCIAL RESPONSIBILITY
SPECIAL REQUIREMENTS

PART II PERMIT APPLICATION
A. LOCATION CHARACTERISTICS

PART II: The following information is required in the permit application for solid waste processing and disposal facilities. All responses and exhibits must be identified in the following sequence to facilitate the evaluation. Additionally, all applicable sections of LAC 33:VII. Chapter 7 must be addressed and incorporated into the application response. If a section does not apply, the applicant must state that it does not apply and explain why.

A. LOCATION CHARACTERISTICS. Standards pertaining to location characteristics are contained in LAC 33:VII.709.A (Type I and II facilities), LAC 33:VII.17.A (Type I-A and II-A facilities) and LAC 33.719.A (Type III facilities).

1. The following information on location characteristics is required for all facilities:

   a. Area Master Plans. A location map showing the facility, road network, major drainage systems, drainage-flow patterns, location of closest population center(s), location of the public-use airport(s) used by turbojet aircraft or piston-type aircraft, proof of notification of affected airport and Federal Aviation Administration as provided in LAC 33:VII.709.A.2, location of the 100 year flood plain, and other pertinent information. The scale of the maps and drawings must be legible, and engineering drawings are required.

RESPONSE

Exhibit 5 is a map showing the vicinity of the proposed Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck and Dragline Service, Inc.), Construction/Demolition-Debris Landfill located in St. Tammany Parish.

Exhibit 6 is a map showing the location of the proposed Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service, Inc.), Construction/Demolition-Debris Landfill located in Section 26 and 44 Township 9 S Range 14 E of St. Tammany Parish and the surrounding area. This map also shows the major drainage systems in the area.

Exhibit 7 is a map showing the highways that traverse the area.

Exhibit 8 is census information and maps showing the major population centers near the proposed Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service, Inc.), Construction/Demolition-Debris Landfill.

Exhibit 9 is a copy of Flood Insurance Rate Map Community Panel Number 225205 0535B, revised March 1, 1984, showing the location of the proposed Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service, Inc.), Construction/Demolition-Debris Landfill relative to the 100-year flood plain.

Exhibit 15 is a map showing the proposed site contours and drainage flow patterns. The site drains to Lake Pontchartrain via a lateral canal and Salt Bayou.

The closest airport to the site is the Slidell Airport located approximately 7.6 miles northwest of the site. The address for the Slidell Airport is 62452 Airport Rd., Slidell, LA.

NEW RESPONSE

No changes to permit text. Exhibits 6, 7, 9 and 15 have been modified to show the modified landfill footprint.

b. A letter from the appropriate agency or agencies regarding those facilities receiving waste generated off-site, stating that the facility will not have a significant adverse impact on the traffic flow of area roadways and that the construction, maintenance, or proposed upgrading of such roads is adequate to withstand the weight of the vehicles.

RESPONSE

Exhibit 10 is a letter from the State of Louisiana Department of Transportation and Development concerning the impact of traffic flow. The site is near an existing Construction Debris Landfill that is being closed. The interstate highway and its associated frontage roads lead to this property. All roads on the property are hard surface or white clay with stone on top for additional traction. The roads are so designed to avoid congestion, sharp turns, obstructions that might be conducive to accidents. The roadways are adequate to withstand the weight of the transporting vehicles.

NEW RESPONSE

Exhibit 10 is a letter from the State of Louisiana Department of Transportation and Development concerning the impact of traffic flow. The interstate highway and its associated frontage roads provide access to this property. All roads on the property are hard surface or clay with stone on top for additional traction. The roadways are adequate to withstand the weight of the transporting vehicles.

c. Existing Land Use - a description of the total existing land use within three miles of the facility (by approximate percentage) including but not limited to:

i. residential;

ii. health-care facilities and schools;

iii. agricultural;

iv. industrial and manufacturing;

v. other commercial;

vi. recreational;

vii. undeveloped.

RESPONSE

Existing land use was determined using 1993 and 1994 U.S. Geological Survey Maps.

APPROXIMATE PERCENTAGES OF EXISTING LAND USE WITHIN THREE MILES OF THE PROPOSED FACILITY

Type of Existing Land use	*Approximate Percentage*
Residential	*25%*
Health-Care Facilities and Schools	*1%*
Agriculture	*0.5%*
Industrial and Manufacturing	*0.5%*
Other Commercial	*16%*
Recreational	*2%*
Undeveloped	*55%*

NEW RESPONSE

Existing land use was determined using 1993 and 1994 U.S. Geological Survey Maps, a St. Tammany Parish Zoning Map dated December, 2004, and a city of Slidell Zoning Map dated 2005.

APPROXIMATE PERCENTAGES OF EXISTING LAND USE WITHIN THREE MILES OF THE PROPOSED FACILITY

Type of Existing Land use	Approximate Percentage
Residential	27%
Health-Care Facilities and Schools	0.5%
Agriculture	1.0%
Industrial and Manufacturing	0.5%
Other Commercial	17%
Recreational	1%
Undeveloped	53%

d. Aerial Photograph - a current aerial photograph, representative of the current land use, of a one mile radius surrounding the facility. The aerial photograph shall be of sufficient scale to depict all pertinent features. (The administrative authority may waive the requirement for an aerial photograph for Type III facilities).

RESPONSE

Since this facility is a Type III construction/demolition debris landfill we request that this be waived.

NEW RESPONSE

A current aerial photograph showing a one-mile radius surrounding the facility has been provided as Exhibit 35.

e. Environmental Characteristics - the following information on environmental characteristics:

i. a list of all known historic sites, recreation areas, archaeological sites, designated wildlife-management areas, swamps and marshes, wetlands, habitats for endangered species, and other sensitive ecological areas within 1,000 feet of the facility perimeter or as otherwise appropriate;

RESPONSE

There are no known historic sites, recreational areas, archeological sites, designated wildlife-management areas, habitats for endangered species, or other sensitive ecological areas within 1,000 feet of the proposed landfill perimeter. There are swamps, marshes, manmade canals and wetlands areas outside of the proposed facility within a 1,000 feet east of the landfill. These areas are separated by levees from the proposed landfill. The levee will be an effective barrier to eliminate possible adverse impacts from this facility. All water discharges will be conducted under a LDEQ Wastewater Permit that has been in place for some years.

Correspondence from the New Orleans District Corps of Engineers has been provided in Exhibit 9.

NEW RESPONSE

There are no known historic sites, recreational areas, archeological sites, designated wildlife management areas, or habitats for endangered species within 1,000 feet of the facility perimeter.

With regard to wetlands, Slidell Landfill has been in close communication with the Corps of Engineers ("COE") regarding the extent of wetlands that may have existed at one time. It is important to note that when the current owners and operators assumed control of the facility, there were no actual wetlands located on the property in areas that were to be used for waste disposal. However, Slidell Landfill is committed to the principle that there will be no

net loss of wetlands as a result of the historic operating of the landfill.

In determining the extent of historic wetlands that may have existed on the property, two documents are relevant. The first is a wetlands delineation performed at the request of Slidell Landfill and the second is an assessment performed by the COE.

First, a wetlands identification and delineation study was commissioned by Slidell Landfill and submitted to the COE on January 3, 2005. As of the date of this submittal, no formal response has been received from the COE. However, based on Slidell Landfill's study, there seemingly have been jurisdictional wetlands (i.e., those that may have been in place as of July, 1977, the effective date of the program) that existed at one time on the property. Dana R. Sanders, Sr., Ph.D., conducted the wetlands study. He utilized the standards set forth by the COE and considered aerial photographs, soil surveys, previous studies, and adjacent site data collection efforts. Dr. Sanders concluded that as of July, 1977, 21.54 acres on the site as a whole may have previously contained wetlands. Of particular importance is a strip of land along the easternmost boundary of the property (which, at this time is understood to include the levee area along part of Cell No. 2 and areas east of the levee outside the working area of the landfill) which may be considered wetlands. Slidell Landfill is working closely with the COE to delineate this specific area. Slidell Landfill is willing to voluntarily insure that no waste is deposited in this area until an 'after-the-fact' permit is obtained, if one is deemed necessary by the COE.

Second in 1980, the COE conducted an Environmental Assessment on the property and found that only one acre of actual wetlands existed on the assessed portion. At the time, clay from the site was used as a 'borrow pit' to build and/or upgrade levees as part of the Lake Pontchartrain Hurricane Protection Plan. The original 'borrow pit' on the property (the site of current Cell No. 1) was ending its useful life. An additional source of clay suitable for the project was needed. It was found

in approximately 37 acres adjacent to and directly south of the 'borrow pit' in use (i.e., the area that is now Cell No. 2 and the old landfill cell which together total approximately 37 acres). The COE surveyed the site in August, 1980 and found that the excavation of the clay from the new 'borrow pit' "will destroy less than an acre of intermediate marsh and 36 acres of pine forest. The COE concluded that the "loss of 37 acres of wetlands and pine woods will not have a significant adverse impact of the human environment" and approved the expansion.

The above generally deals with areas of current use (i.e., the old landfill cell and Cell Nos. 1 and 2), which are the subject of the request for a vertical expansion. There is a small area of approximately two acres to the west of Cell No. 1 by the new pond area that constitutes a lateral or horizontal expansion. The disposal needs wrought by the hurricane necessitated the use of this area under LDEQ's emergency authorizations. However, the COE has informally indicated to Slidell Landfill and the LDEQ that this area is not considered wetlands.

Slidell Landfill has taken steps to insure that all wetlands issues are resolved with the COE. It has worked extensively with the COE, not only to provide information, but also to conduct remedial work with COE approval. Specific areas of Cell No. 2 although primarily located in a non-wetlands area with only an easternmost strip of land found to be potential wetlands will be segregated from waste deposition until full COE approval is obtained for that specific area. Further Slidell Landfill is pursuing an "after-the-fact" permit for any on-site jurisdictional wetlands that may have been unintentionally altered from July, 1977 through January, 2001. Additionally, as previously stated, Slidell Landfill remains fully committed to insuring that no net loss of wetlands occurs. Thus, Slidell Landfill has offered to provide the appropriate mitigation of any past activities that impacted wetlands. Recent approval of the activities proposed in this Modification was granted by the COE as provided in Exhibit 9.

ii. documentation from the appropriate state and federal agencies substantiating the historic sites, recreation areas, archeological sites, designated wild-life management areas, wetland, habitats for endangered species, and other sensitive ecological areas within 1,000 feet of the facility; and

RESPONSE

Exhibit 11 is a letter from the State of Louisiana Department of Culture, Recreation and Tourism, Office of Cultural Development stating that there are no known archeological sites or historical structures located within 1,000 feet of the permit site.

Exhibit 12 is a letter from the State of Louisiana Department of Wildlife and Fisheries stating that there are no known rare, threatened, or endangered species or critical habitats found within the area of the permit site. Also no state or federal parks, wildlife refuges, or wildlife management areas are known at the specified site.

Exhibit 13 is a letter from the State of Louisiana Department of Culture, Recreation and Tourism, Office of Outdoor Recreation, stating that there are no known recreational areas within 1,000 feet of the permit site.

NEW RESPONSE

Exhibit 11 is a letter from the State of Louisiana Department of Culture, Recreation and Tourism, Office of Cultural Development stating that there are no known archeological sites or historical structures located within 1,000 feet of the permit site.

Exhibit 12 is a letter from the State of Louisiana Department of Wildlife and Fisheries stating that there are no known rare, threatened, or endangered species or critical habitats found within the area of the permit site. Also no state or federal parks, wildlife refuges, or wildlife management areas are known at the specified site.

Exhibit 13 is a letter from the State of Louisiana Department of Culture, Recreation and Tourism, Office of Outdoor Recreation, stating that there are no known recreational areas within 1,000 feet of the permit site.

See response to 521.A.1.e.(i) regarding wetlands issues.

iii. a description of the measures planned to protect the areas listed from the adverse impact of operation at the facility;

RESPONSE

There are no known areas which will be adversely affected by the operation of the Johnny F. Smith Truck & Dragline Service, Inc. Demolition/Construction-Debris Landfill. The landfill activities should not affect the adjacent wetland area. All operational measures are appropriate for this type of operation. The LDEQ Wastewater Permit limits the quality of the water discharged to the receiving waters. All operational measures and LDEQ regulatory requirements will preclude adverse impact in the receiving waters and surrounding area.

Johnny F. Smith Truck & Dragline Services, Inc. will not deposit or redistribute dredge or fill material into wetlands areas, ponds or drains without obtaining a U.S. Department of Army permit under Section 404 of the Clean Water Act.

NEW RESPONSE

There are no known historic sites, recreational areas, archeological sites, designated wildlife management areas, or habitats for endangered species that will be adversely impacted by operation of Slidell Landfill. With regard to wetlands, please see response to 521A.1.e(i).

f. A wetlands demonstration, if applicable, as provided in LAC 33:VII.709.A.4

RESPONSE

Correspondence from the New Orleans District Corps of Engineers has been provided in Exhibit 9

NEW RESPONSE

See response to 521 A.1.e(i).

g. Demographic Information - the estimated population density within a three-mile radius of the facility boundary, based on the latest census figures.

RESPONSE

The EPA Geographic Information Query System (Version 97.1.8) was queried on March 3, 1998 to determine the population densities within one, three and 50 mile radius circles from the Slidell Landfill, L.L.C. (Johnny F. Smith Truck & Dragline Service, Inc.), Demolition/Construction-Debris Landfill. Based upon this survey, the "average household size" was 2.36 people per household as per the 1990 U.S. Census data. The total number of people within a three mile radius of the proposed facility is 19,990. The estimated population density within a three mile radius was determined to be 705 persons per square mile. A copy of this census information is included in Exhibit 8.

NEW RESPONSE

The U.S. Census Bureau, 2000 Census Data, was queried to determine the population densities within an approximate 3-mile radius of the Slidell Landfill. Based upon this survey, the "average household size" was 3.09 people per household. The total number of people within three miles of the proposed facility is approximately 44,114. The estimated population density within three miles was determined to be 1,225 persons per square mile. A copy of this census information is included in Exhibit 8.

2. The following information regarding wells, faults, and utilities is required for Type I and II facilities.

a. Wells. Map showing the location of all known or recorded shot holes and seismic lines, private water wells, oil and/or gas wells, operating or abandoned, within the facility and within 2,000 feet of the facility perimeter and the location of all public water systems, industrial water wells, and irrigation wells within one mile of the facility. A plan shall be provided to prevent adverse effects on the environment from the wells and shot holes located on the facility.

RESPONSE

Not applicable - The proposed Landfill is a Type III facility.

b. Faults

i. scaled map showing the location of all recorded faults within the facility and within one mile of the perimeter of the facility; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. demonstration, if applicable, of alternative fault setback as provided in LAC 33:VII.709.A.5.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. Utilities. Scale map showing the location of all pipelines, power lines, and right of ways within the site.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
B. FACILITY CHARACTERISTICS

B. FACILITY CHARACTERISTICS. Standards concerning facility characteristics are contained in LAC 33:VII.709.B (Type I and II facilities), LAC 33:VII.717.B (Type I-A and II-A facilities), and LAC 33:VII.719.B (Type III facilities). A facility plan, including drawings and a narrative, describing the information required below must be provided.

1. The following information is required for all facilities:

   a. elements of the process or disposal system employed, including, as applicable, property lines, original contours (shown at not greater than five-foot intervals), buildings, units of the facility, drainage, ditches and roads;

RESPONSE

A site plan showing the existing layout has been included as Exhibit 14, which delineates property lines, existing contours, existing ditches and drainage patterns etc.

Exhibit 15 has been included to show the proposed buildings, units of the facility, drainage patterns, contours, ditches and roads in relation to the existing site.

As shown on Exhibit 15, the proposed discharge point is located in the extreme northeastern portion of the proposed landfill. Water accumulating in this area will be pumped into the drainage ditch located adjacent to the eastern side of the proposed landfill.

NEW RESPONSE

A site plan showing the layout of the facility as surveyed in May, 2004 has been included as Exhibit 14. The layout delineates property lines, existing contours, and drainage patterns at that time. A survey map showing the property lines of the ± 68 acre site of which the landfill encompasses ±48 acres has also been included in Exhibit 14.

Exhibit 15 has been included to show the proposed buildings, units of the facility, drainage patterns, contours, ditches and roads in relation to the existing site. The contours shown on Exhibit 15 represent site elevations that were applicable immediately prior to commencement of landfilling activities in Cells 1 and 2 on the site.

As shown on Exhibit 15, outfalls 001 and 002 are located on the northerly end of cell nos. 1 and 2, respectively. Outfall 001 has been rendered inactive since recent commencement of landfilling activities in cell no. 1. Outfall 003 (treated sanitary wastewater) and outfall 004 (exterior heavy equipment and vehicle washwater) are located northwest of the Old Landfill Cell. The discharge from outfalls 003 and 004 gravity drains into a recently constructed stormwater holding pond. The discharges from outfalls 003 and 004 are sampled prior to draining of the discharges into the pond.

b. the perimeter barrier and other control measures;

RESPONSE

For safety and isolation measures, the proposed Landfill will have a fence with a locking gate across the only entrance to the Landfill to permit controlled entrances. The fence will consist of a 6 foot chain link fence. The buffer on the southern, eastern, and western sides of the property is wooded or undeveloped and will serve as a natural barrier for the proposed Landfill. An earthen berm will be constructed and will serve as an additional barrier for the northern, eastern, and western sides of the proposed Landfill. The proposed Landfill will have a posted readable sign at the entrance gate that lists the types of wastes that will not be accepted at the Landfill.

During operating hours, the entry point will be continuously monitored. This operation will be manned to control entry. The office is located as to be able to observe all entry in the facility. Disposal of any acceptable materials has to have a ticket from the office or the spotter/dozer operator will not accept the load for disposal.

After hours the gate will be locked, barring entry.

NEW RESPONSE

For safety and isolation measures, the proposed Landfill will have a fence with a locking gate across the only entrance to the Landfill to permit controlled entrances. The fence and gate are currently in place and would be expected to prevent unauthorized ingress/egress except by willful entry. An earthen berm will be constructed and will serve as an additional barrier for the northern, eastern, and western sides of the proposed Landfill. The

proposed Landfill will have a posted readable sign at the entrance gate that lists the types of wastes that will not be accepted at the Landfill. The sign is currently in place.

During operating hours, the entry point will be continuously monitored. This operation will be manned to control entry. The office is located as to be able to observe all entry in the facility. Disposal of any acceptable materials requires a ticket from the office or the spotter/dozer operator will not accept the load for disposal.

After hours the gate will be locked, barring entry.

c. a buffer zone;

RESPONSE

A 50 foot buffer is required between the facility and the property line and will be adhered to along the entire perimeter of the property (see Exhibit 15). In accordance with 719.B.2, no processing, storage or disposal of waste shall occur within the buffer zone.

d. fire-protection measures;

RESPONSE

Exhibit 16 is a map showing the two closest St. Tammany Parish Fire Department Stations to the site. Each of these Fire Stations are located within approximately 3 miles of the proposed Landfill. Exhibit 17 contains the Fire and Safety Plan for the site.

Training sessions concerning the procedures outlined in the Fire and Safety Plan will be conducted annually for all employees working at the facility. A copy of the training program will be filed with the administrative authority.

NEW RESPONSE

Exhibit 16 is a map showing the two closest St. Tammany Parish Fire Department Stations and the closest medical facility to the site. Each of the Fire Stations are located within approximately 3 miles of the proposed Landfill. The medical facility (Northshore Regional Medical Center) is located within approximately 5 miles of the landfill. Exhibit 17 contains the Fire and Safety Plan for the site.

Training sessions concerning the procedures outlined in the Fire and Safety Plan will be conducted annually for all employees working at the facility. A copy of the training program will be filed with the administrative authority.

e. landscaping and other beautification efforts;

RESPONSE

Landscaping will be provided to reflect the local aesthetics. Natural vegetation when possible, grass cover and other control methods for beautification will be used. The height of the grass on the final cover shall be maintained.

f. devices or methods to determine, record, and monitor incoming waste;

RESPONSE

A readable sign will be posted at the entrance listing the types of waste that can be received at the proposed Johnny F. Smith Truck & Dragline Services, Inc., Construction/Demolition-Debris Landfill. Unacceptable materials will not be unloaded at the site.

The site controls the entry via a locking gate. All vehicles must go through a check-in point where the construction demolition debris is checked. No load is accepted for disposal without a ticket from the office. Then as the material from the vehicles are unloaded, another check of them is done to assure that all materials are construction debris only. All measurements of weight (wet-weight tonnage) is made by the capacity of the vehicle. Included as Exhibit 18 is a list of the type of vehicles that dump waste in the landfill and the estimated weight (wet-weight tonnage) of each.

All data will be recorded and kept at the facility. A log will be kept for the Landfill by the Landfill Manager depicting the amount of the load, general content of load and truck operator. An example of a load ticket is included as Exhibit 19.

NEW RESPONSE

A readable sign is currently posted at the entrance listing the types of waste that can be received at the Slidell Landfill. Unacceptable materials will not be unloaded at the site.

The site controls the entry via a locking gate. All vehicles must go through a check-in point where the construction demolition debris is checked. No load is accepted for disposal without a ticket from the office. As the material from the vehicles is unloaded, another check is performed to assure that all materials are construction debris or woodwaste only. Measurements of weight (wet-weight tonnage) are provided by means of a scale that is currently in place and is being used by the landfill. In the event that the scale is inoperable for any reason, wet-weight tonnage will be estimated based on the volume of the material multiplied by an average bulk density of 484 lbs per cubic yard. Supporting documentation for the average bulk density estimate of 484 lbs per cubic yard has been provided as Exhibit 18.

All data will be recorded and kept at the facility. A log will be kept for the Landfill by the Landfill Manager depicting the amount of the load, general content of load and truck operator. An example of a load ticket is included as Exhibit 19.

g. NPDES discharge points (existing and proposed); and

RESPONSE

Exhibit 20 is a copy of the Louisiana Department of Environmental Quality (LADEQ) Water Discharge Permit (WP5091) for the Landfill application. The proposed Landfill and immediate adjacent areas will discharge into Lake Pontchartrain via a lateral canal and Salt Bayou. The location of the current discharge point is shown on Exhibit 14. The location of the proposed discharge point is shown on Exhibit 15.

NEW RESPONSE

The facility is authorized to discharge pursuant to LPDES Permit No. LA0105465, issued December 7, 1999 and effective January 1, 2000. See Exhibit 20. A timely renewal application was filed with the LDEQ. The application has been deemed administratively complete. A recent Amendment to the timely renewal application has been provided in Exhibit 20.

The existing LPDES discharge points are noted in Exhibit 20 (the LPDES permit), Exhibit 14 (Figure 14, "Existing Site Plan Layout"), and Exhibit 15 (Figure 15, "Proposed Site Layout").

On or about August 20, 2004, the LDEQ issued a Consolidated Compliance Order & Notice of Potential Penalty, No. WE-CN-04-049 ("CCONPP"). On or about September 21, 2004, LDEQ issued an Administrative Order, No. WE-AO-04-1119 ("AO"). Slidell Landfill timely exercised its right to request a hearing on both actions, thus staying the provision of each. Dispute Resolution Agreements are currently in effect.

The AO requires that Slidell Landfill take a sample once per day when discharging from Outfalls 001 and 002 and analyze the sample for BOD_5. Despite the stay of the AO, Slidell Landfill voluntarily subjected itself to an even more stringent sampling and analysis plan for discharges from Outfalls 001 and 002 than the one proposed by LDEQ in the AO. Submitted to LDEQ on October 26, 2004, Slidell Landfill's plan required, among other things: 1) that all samples be analyzed for the parameters in Slidell Landfill's current LPDES permit as well as all parameters listed in the General Permit for Construction/Demolition Debris and Woodwaste Landfills; 2) that samples be taken of the water in Cell No. 2 prior to discharge; 3) that the results must show compliance with all parameters in both permits prior to discharge; 4) that a sample be taken upon discharging from Outfall 001 and 002 on the first such day of discharge; and 5) that prior to discharge, Slidell Landfill will also use its Best Professional Judgement to insure that Slidell Landfill goes above and beyond that which is required under its current permit so that LDEQ may be reassured that the facility is minimizing any potential impacts from facility operations.

Since recent commencement of landfilling activities in cell no. 1, outfall 001 has been rendered inactive. It is anticipated that no further discharges will occur through outfall 001. Thus, all water to be discharged from the landfill is and will continue to be sampled prior to discharge, as voluntarily self-imposed by Slidell Landfill.

Additionally, Slidell Landfill presented to LDEQ, on or about December 23, 2004, a Stormwater Pollution Prevention Plan ("SWPPP"). The SWPPP amended and supplemented the existing one. The SWPPP provides a comprehensive set of procedures designed to insure that no pollutant enters stormwater and/or that the possibility of pollutants entering stormwater is minimized as much as possible.

h. other features as appropriate.

RESPONSE

Not applicable

2. The following information is required for Type I and II facilities:

a. areas for isolating nonputrescible waste or incinerator ash, and borrow areas; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. location of leachate collection/treatment/removal system.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II APPLICATION
C. FACILITY SURFACE HYDROLOGY

C. **FACILITY SURFACE HYDROLOGY**. Standards governing facility surface hydrology are contained in LAC 33:VII.711.A (Type I and II landfills), LAC 33:VII.713A (Type I and II surface impoundments), LAC 33:VII.715.A (Type I and II landfarms), LAC 33:VII.717.C (Type I-A and II-A facilities), and LAC 33:VII.719.C (Type III facilities).

1. The following information regarding surface hydrology is required for all facilities:

   a. a description of the method to be used to prevent surface drainage through the operating areas of the facility;

RESPONSE

Currently the proposed landfill has an existing pit. A levee will be constructed around all sides of the pit, which will divert surface drainage away from the operating areas of the facility. The proposed levee will be constructed to an elevation of 9.5 feet above mean sea level to prevent the 100-year flood from entering the proposed landfill. The proposed levee will be maintained throughout the operation of the proposed landfill. All rainwater entering the pit area will be pumped into the drainage ditches adjacent to the landfill (See Exhibit 15).

Filling shall continue until final contours are established (See Exhibit 21 and 21B). The final cover shall have sideslopes no steeper than 3:1 and a minimum crown slope of 4% to provide adequate drainage. All surface water which comes in contact with the aboveground material will essentially drain to drainage ditches.

NEW RESPONSE

The existing landfill currently consists of active Cell No. 2 and a recently activated pit designated as Cell No. 1. It is proposed that existing cell nos. 1 and 2 be combined with the immediately adjacent 20.5 acre Old Slidell Landfill. Cell nos. 1 and 2 and the adjacent Old Slidell Landfill will be surrounded by a combination of levees, berms, and ditches that prevent offsite stormwater from entering the landfill and that also prevent stormwater from exiting the landfill except through permitted sources. Levees will be maintained around the perimeter of the landfill to minimum heights of approximately 9.0 feet above mean sea level to protect the landfill from up to a 100-year flood event. Exhibits 15, 21, and 21B provide drainage patterns for the landfill at various stages of construction. Should proposed drainage patterns be required to

be modified for any reason, applicable permissions will be acquired prior to implementation of any modifications.

b. a description of the facility runoff/run-on collection system;

RESPONSE

All facility run-off will drain to drainage ditches due to the natural and proposed drainage pattern. The only run on collection will be that surface water (rainwater) which falls into the excavated pit itself. This water will be handled as described in Section 521.C.1.a.

c. the maximum rainfall from a 24-hour/25-year storm event;

RESPONSE

Operations in this area under the landowner's ownership indicates that even with hurricanes, the maximum amount of rainfall is 12 inches for a 24 hour period. This would not overwhelm the operation. After a major disaster the operation of this proposed landfill would be available and in compliance with its permits. Rainwater that falls into the proposed landfill would be tested and then discharged under our NPDES permit. No rainfall from non landfill area can enter the disposal area.

NEW RESPONSE

The maximum amount of rainfall from a 24-hour/25-year event is estimated to be 12 inches. This amount of rainfall would not overwhelm facility operations. Rainwater that falls within the limits of the proposed landfill will be tested and discharged in accordance with the existing water discharge permit for the facility. No rainfall from non-landfill areas will be allowed to drain into the landfill.

d. the location of aquifer recharge areas in the site or within 1,000 feet of the site perimeter, along with a description of the measures planned to protect those areas from the adverse impact of operations at the facility; and

RESPONSE

There are none (see Exhibit 22). Subsurface soils consist predominately of clay. Excavation activities will not exceed the depth of on-site clays.

NEW RESPONSE

An updated aquifer recharge map has been provided in Exhibit 22. There are no known aquifer recharge areas within 1,000 feet of the landfill. Subsurface soils beneath the landfill consist predominately of clay. Proposed excavation activities will not exceed the depth of on-site clays.

e. if the facility is located in a flood plain, a plan to ensure that the facility does not restrict the flow of the 100 year base flood or significantly reduce the temporary water-storage capacity of the flood plain, and documentation indicating that the design of the facility is such that the flooding does not affect the integrity of the facility or result in the washout of solid waste.

RESPONSE

The location of the proposed facility is in Southeastern St. Tammany parish, near Lake Pontchartrain, but within levees. This is bounded by commercial operations that adhere to the parish, state and/or federal regulations concerning flood plains. The levee elevations are higher than the surrounding residential and interstate highway roads. During the May 9, 1995 floods, this area in the proposed landfill site did not flood. See Exhibit 9. These levees will not constrict, restrict or otherwise impact flow in a 100 year flood or within existing area levees. The design of this landfill will contain all Construction/Demolition debris that will be disposed.

NEW RESPONSE

The location of the proposed facility is in Southeastern St. Tammany Parish near Lake Ponchartrain. The facility is bounded by levees and/or berms and ditches. The modification proposed herein is for expansion of the currently permitted landfill cells into the area currently occupied by the old landfill, plus approximately 2 acres of a recently purchased tract of land located immediately west of cell no. 2. There will be no appreciable reduction, if any, in the storage capacity of the adjacent flood plain. Perimeter ditches and levees ensure that flooding does not significantly impact the facility or result in washout of solid waste.

PART II PERMIT APPLICATION
D. FACILITY GEOLOGY

D. FACILITY GEOLOGY. Standards governing facility geology are contained in LAC 33:VII.709C (Type I and II facilities), LAC 33:VII.717D (Type I-A and II-A facilities), and LAC 33:VII.719.D (Type III facilities).

1. The following information regarding geology is required for Type I and Type II facilities:

   a. isometric profile and cross-section of soils, by type thickness, and permeability;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

   b. logs of all known soil borings taken on the facility and a description of the methods used to seal abandoned soil borings;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

   c. results of test for classifying soils (moisture contents, Atterberg limits, gradation, etc.), measuring soil strength and determining the coefficients of permeability, and other applicable geotechnical tests;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

NEW RESPONSE

A slope stability analysis was performed by Soil Testing Engineers in February, 2005 at the request of Engineering Associates. Based on the proposed landfill configuration, a minimum calculated factor of safety for a circular failure surface of 1.50 was determined to be applicable for short-term conditions and 1.62 for long-term conditions. A copy of the slope stability analysis report which provides a detailed discussion of all strength tests performed and the results of each has been included as Exhibit 36. Based on the results of the study, the calculated safety factors for the landfill configuration proposed herein are adequate.

d. geologic cross-section from available published information depicting the stratigraphy to a depth of at least 200 feet below the ground surface;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

e. for faults mapped as existing through the facility, verification of their presence by geophysical mapping or stratigraphic correlation of boring logs. If the plane of the fault is verified within the facility's boundaries, a discussion of measures that will be taken to mitigate adverse effects on the facility and the environment;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

f. for a facility located in a seismic impact zone, a report with calculations demonstrating the facility will be designed and operated so that it can withstand the stresses caused by the maximum ground motion as provided in LAC 33:VII.709.C.2; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

g. for a facility located in an unstable area, a demonstration of facility design as provided in LAC 33:VII.709.C.3.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

2. The following information regarding geology is required by Type III woodwaste, and construction/demolition-debris facilities:

a. general description of the soils provided by a qualified professional (a geotechnical engineer, soil scientist, or geologist) along with a description of the method used to determine soil characteristics; and

RESPONSE

Five soil borings (identified as B-1 through B-5) and four undisturbed soil samples from side slopes (identified as B-7 through B-10) were conducted on cell 2 of the proposed Landfill site and data has been included as Exhibit 23 showing the results of the borings. The boring holes were backfilled with compacted bentonite chips flush with the surrounding grade upon completion.

The five soil borings were installed to a depth of five feet below the bottom of the proposed excavated waste cells.

Soil material collected from the soil borings and side slopes was visually inspected and determined to be predominantly clay (CH + CL). Laboratory analysis results for representative soil samples indicate that the soil exhibits hydraulic conductivities (ASTM 5084 Method C) ranging from 3.5 x 10^{-8} to 8.1 x 10^{-9} cm/sec. This clay soil will provide an excellent barrier for the bottom of the landfill.

The western portion of the landfill is to be excavated to a depth of 23 feet to 23.5 feet below mean sea level and the eastern portion of the landfill is to be excavated to a depth of 20.5 feet to 21 feet below mean sea level. (See Exhibit 21B).

Three soil borings were installed in the area of Cell 1 by Engineering Associates, Inc., to depths of 30 feet below ground surface (bgs). A copy of the soil boring logs and the geotechnical test data conducted on soil samples from these borings are included as Exhibit 23. As shown on the soil boring logs, predominately clayey soils were encountered in each of the borings from the ground surface to a depth of 30 ft-bgs, with the exception of a silty clay sand at the 27-29.5 ft. depth in boring B-1.

NEW RESPONSE

Five soil borings (identified as B-1 through B-5) and four undisturbed soil samples from side slopes (identified as B-7 through B-10) were conducted on cell 2 of the proposed Landfill site and data has been included as Exhibit 23 showing the results of the borings. The boring holes were backfilled with compacted bentonite chips flush with the surrounding grade upon completion.

The five soil borings were installed to a depth of five feet below the bottom of the proposed excavated waste cells.

Soil material collected from the soil borings and side slopes was visually inspected and determined to be predominantly clay (CH + CL). Laboratory analysis results for representative soil samples indicate that the soil exhibits hydraulic conductivities (ASTM 5084 Method C) ranging from 3.5 x 10^{-8} to 8.1 x 10^{-9} cm/sec. This clay soil will provide an excellent barrier for the bottom of the landfill.

The western portion of the landfill is to be excavated to a maximum depth ranging from approximately 22 feet to 24 feet below mean sea level and the eastern portion of the landfill is to be excavated to a maximum depth ranging from approximately 21 feet to 24 feet below mean sea level. (See Exhibit 15).

Three soil borings were installed in the area of Cell 1 by Engineering Associates, Inc., to depths of 30 feet below ground surface (bgs). A copy of the soil boring logs and the geotechnical test data conducted on soil samples from these borings are included as Exhibit 23. As shown on the soil boring logs, predominately clayey soils were encountered in each of the borings from the ground surface to a depth of 30 ft-bgs, with the exception of a silty clay sand at the 27-29.5 ft. depth in boring B-1.

In January and February, 2005, Soil Testing Engineers installed three soil borings adjacent to the Old Landfill Cell and also performed slope stability calculations for the proposed landfill configuration. A copy of Soil Testing Engineers' report has been provided in Exhibit 36.

As shown on the Boring Location Plan included in Exhibit 36, borings B-1, B-2, and B-3 were installed on the east and west sides of the ±20.5 acre Old Landfill Cell. The borings were installed to depths of 60 feet, 36 feet, and 34 feet below ground surface, respectively. These depths correspond with mean sea level (msl) elevations of (-)55 feet for boring B-1, (-)31 feet for boring B-2, and (-)30 feet for boring B-3.

No historic maps documenting the depth of excavation of the Old Landfill Cell are available based on inquiries of on-site personnel. However, on-site personnel have stated/confirmed that the Old Landfill Cell was not excavated to depths exceeding the maximum depths of cell nos. 1 and 2, which is –25 feet msl. As such, all three borings installed adjacent to the Old Landfill Cell were drilled to a depth of at least –30 feet msl, corresponding with 5 feet below the deepest excavation.

As shown on the Boring Logs included in Exhibit 36, predominately clayey soils were observed in all three borings to depths of at least (-)30 feet msl. Laboratory analysis of soil samples from each boring indicate permeability values of $1.8x10^{-8}$ cm/sec at a depth of 39 feet in boring B-1, $7.8x10^{-9}$ cm/sec in boring B-2 at a depth of 36 feet, and $1.2x10^{-6}$ cm/sec in boring B-3 at a depth of 30 feet. The soils in boring B-3 exhibited a permeability value of $9.1x10^{-8}$ cm/sec at a depth of 25 feet, as shown on correspondence included in Exhibit 36.

Based on review of the boring logs for borings B-1 through B-5 (Exhibit 23) installed by Soil Testing Engineers in October, 1997, a stiff clay of low permeability has been confirmed to be present beneath the entire limits of Cell 2 and along the north side of the Old Landfill Cell. The more permeable material encountered at a depth of 30 feet below ground surface is boring B-3 installed in February 2005 is believed to be limited in extent based on an overall review of all soil borings installed at the site. In addition, the placement of 30-day interim compacted clay cover and the eventual placement of a landfill cap consisting of two feet of compacted clay further serves to ensure the protection of groundwater in the vicinity of the landfill .

b. logs of all known soil borings taken on the facility and a description of the methods used to seal abandoned soil borings;

RESPONSE

Five soil borings were conducted on cell 2 of the proposed Landfill site and three soil borings were conducted on Cell 1 of the proposed Landfill site. Data has been included as Exhibit 23 showing the results of the borings. The boring holes were backfilled with compacted bentonite chips of cement-bentonite grout flush with the surrounding grade upon completion.

NEW RESPONSE

Boring logs for all soil borings installed in the Slidell Landfill are included in Exhibits 23 and 36. All boreholes were filled with a cement-bentonite mixture flush with the surrounding grade upon completion.

PART II PERMIT APPLICATION
E. FACILITY SUBSURFACE HYDROLOGY

E. **FACILITY SUBSURFACE HYDROLOGY.** Standards governing the facility subsurface hydrology are contained in LAC 33:VII.715.A (Type I and II landfarms)

1. The following information on subsurface hydrology is required for all Type I facilities and Type II landfills and surface impoundments:

a. delineation of the following information for the water table and all permeable zones from the ground surface to a depth of at least 30 feet below the base of excavation:

i. areal extent beneath the facility;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. thickness and depth of the permeable zones and fluctuations;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

I ii. direction(s) and rate(s) of groundwater flow based on information obtained from piezometers and shown on potentiometric maps; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iv. any change in groundwater flow direction anticipated to result from any facility activities.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. delineation of the following, from all available information, for all recognized aquifers which have their upper surfaces within 2,000 feet of the ground surface.

i. areal extent;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. thickness and depth to the upper surface;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iii. any interconnection of aquifers; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iv. direction(s) and rate(s) of groundwater flow shown on potentiometric maps.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility

2. The following information of subsurface hydrology is required for Type I landfarms. Delineation of the following information for the water table and all permeable zones from the ground surface to a depth of at least 30 feet below the zone of incorporation:

a. areal extent beneath the facility;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. thickness and depth of the permeable zone and fluctuations;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. direction(s) and rate(s) of groundwater flow based on information obtained from piezometers and shown on potentiometric maps; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

d. any change in groundwater flow direction anticipated to result from any facilities activities.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
F. FACILITY PLANS AND SPECIFICATIONS

F. **FACILITY PLANS AND SPECIFICATIONS.** Standards governing facility plans and specifications are contained in LAC 33:VII.711.B (Type I and II landfills), LAC 33:VII.713B (Type I and II surface impoundments), LAC 33:VII.715.B (Type I and II landfarms), LAC 33:717E (Type I-A and II-A facilities), LAC 33:VII.721.A (Type III construction and demolition debris and woodwaste landfills), LAC 33 VII.723.A (Type III composting facilities), and LAC 33:VII.725.A (Type III separation facilities). Standards for groundwater monitoring are contained in LAC 33:VII.709.E (Type I and II facilities).

1. Certification-The person who prepared the permit application must provide the following certification:

   "I certify under penalty of law that I have personally examined and I am familiar with the information submitted in this permit application and that the facility as described in this permit application meets the requirements of the Solid Waste Rules and Regulation. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment."

RESPONSE

Exhibit 24 has been included for Certification of the Permit Application.

2. The following information on plans and specifications is required for Type I and II facilities:

   a. detailed plan-view drawing(s) showing original contours, proposed elevations of the base of units prior to installation of the liner system, and boring locations;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

   b. detailed drawings of slopes, levees, and other pertinent features; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. the type of material and its source for levee construction. Calculations shall be submitted demonstrating that an adequate volume of material is available for the required levee construction.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

3. The following information on plans and specifications is required for Type I, II, and III landfills:

a. approximate dimensions of daily fill and cover; and

RESPONSE

Daily cover not required. Fill and cover will be implemented as required by the daily operations.

b. the type of cover and its source for daily, interim, and final cover. Calculations shall be submitted demonstrating that an adequate volume of material is available for daily, interim and final cover.

RESPONSE

The source for the routine and final cover material for the ground filled areas shall be the soil which is excavated from the adjacent property owned by landowner. The soil characteristics at the site are predominately clay (CH+CL) and are described in the geotechnical report included as Exhibit 23.

The Clay strata in the area varies, but is usually over 40 feet thick. The calculations are as follows:

1. ***To build New Levees and Build up existing levees- approximately 14,000 c.y.***
2. ***Interim cover-We receive on average 4,000 to 4,500 c.y. of fill from offsite monthly. This is used for interim cover and will cover an area of 350 feet by 350 feet by 1 foot.***
3. ***Final cover-25.5 acre cover at 2 feet with slope.***
   Material needed - 82,280 c.y.
   Material needed for levee work - 14,000 c.y.
4. ***Total Need - 96,280 c.y.***

5. *Excavation from Dump Site - 81,000 c.y.*

All Construction/Demolition-Debris deposited in the proposed Landfill will be compacted and covered with predominant clay soil applied a minimum of twelve inches (12") thick, at least every 30 days.

NEW RESPONSE

The source for the routine and final cover material for the ground filled areas shall be the soil which is excavated from the adjacent property owned by landowner, combined with imported offsite material on an as-needed basis. The soil characteristics at the site are predominately clay (CH+CL) and are described in the geotechnical reports included as Exhibits 23 and 36.

The Clay strata in the area varies, but is usually over 40 feet thick. The calculations are as follows:

1. *To build New Levees and Build up existing levees- approximately 14,000 c.y.*
2. *Interim cover-On average this facility receives 4,000 to 4,500 c.y. of fill from offsite sources monthly. This is used for interim cover and will cover an area of 350 feet by 350 feet by 1 foot.*
3. *Final cover ±48.0 acres cover at 2 feet with slope.*
   Material needed for cover 145,450 c.y.
   Material needed for levee work 14,000 c.y.
4. *Total Need 159,450 c.y.*
5. *Material available from landfill*
   less 14,000 cy utilized for levees 67,000 c.y.

All Construction/Demolition-Debris deposited in the proposed Landfill will be compacted and covered with predominant clay soil applied a minimum of twelve inches (12") thick, at least every 30 days. The cover material will: (1) Minimize vector breeding areas and animal attraction by controlling:

a) fly, mosquito, and other insect emergence and entrance;

b) rodent burrowing for food and harborage; and

c) bird and animal attraction;

(2) Control leachate generation by:
a) minimizing external-moisture infiltration;
b) minimizing erosion;
c) utilizing materials with minimum free-liquid content and minimum concentrations of constituents monitored in leachate;
(3) Reduce fire-hazard potential by minimizing inward movement of atmospheric oxygen;
(4) Minimize blowing paper and litter;
(5) Reduce noxious odors by minimizing outward movement of methane and other gases;
(6) Provide aesthetic appearance to the landfill operation; and
(7) Allow accessibility regardless of weather.

Levees have been and/or will be constructed around the entire limits of the landfill to provide protection from a 100-year flood event. The perimeter levees will be engineered to minimize wind and water erosion and a vegetative cover will be maintained on all levees to preserve the levees' structural integrity.

4. The following information on plans and specifications for the prevention of groundwater contamination must be submitted for Type I and II facilities.

a. representative cross-section and geologic cross-section showing original and final grades, approximate dimensions of daily fill and cover, drainage, the water table, groundwater conditions, the location and type of liner, and other pertinent information;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. a description of the liner system, which shall include: calculations of anticipated leachate volumes, rationale for particular designs of such systems and drawings; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. a description of the leachate collection and removal system, which shall include calculations of anticipated leachate volumes, rationale for particular designs of such systems, and drawings.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

5. The following information on plans and specifications for groundwater monitoring must be provided for Type I and II facilities:

a. a minimum of three piezometers or monitoring wells in the same zone must be provided in order to determine groundwater flow direction;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. for groundwater monitoring wells, cross-sections illustrating construction of wells, a scaled map indicating well locations and the relevant point of compliance, and pertinent data on each well, presented in tabular form, including drilled depth, the depth to which the well is cased, screen interval, slot size, elevations of the top and bottom of the screen casing size, type of grout, ground surface elevation, etc.,;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. a groundwater monitoring program including a sampling and analysis plan that includes consistent sampling and analysis procedures that ensure that monitoring results provide reliable indications of groundwater quality;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

d. for an existing facility, all data on samples taken from monitoring wells in place at the time of the permit application must be included. (If this data exists in the Solid Waste Division records, the administrative authority may allow references to the data in the permit application). For an existing facility with no wells, groundwater data shall be submitted within 90 days after the installation of monitoring wells. For a new facility, groundwater data (one sampling event) shall be submitted before waste is accepted;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

e. a plan for detecting, reporting, and verifying changes in groundwater; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

f. the method for plugging and abandonment of groundwater monitoring systems.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

6. The facility plans and specifications for Type I and II landfills and surface impoundments (surface impoundments with on-site closure and potential to produce gases) must provide a gas collection and treatment or removal system.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
G. FACILITY ADMINISTRATIVE PROCEDURES

G. **FACILITY ADMINISTRATIVE PROCEDURES.** Standard governing facility administrative procedures are contained in LAC 33:VII.711.C (Type I and II landfills), LAC 33:VII.713.C (Type I and II surface impoundments), LAC 33:VII.715.C (Type I and II landfarms), LAC 33:VII.717.F (Type I-A and II-A facilities), LAC 33:VII.721.B (Type III construction and demolition debris and woodwaste landfills), LAC 33:VII.723.B (Type III composting facilities), and LAC 33:VII.725.B (Type III separation facilities).

1. The following information on administrative procedures is required for all facilities:

   a. record keeping system; types of records to be kept; and the use of records by management to control operations;

RESPONSE

The quantity (wet-weight tonnage) of the solid waste entering the site will be calculated using the weights per vehicle as shown in Exhibit 18. All waste items which are determined to be unacceptable construction/demolition-debris shall not be unloaded at the site.

All loads dumped at the site will be recorded utilizing a computerized database that will be backed up to allow for computer accidents. Additionally, a written receipt will be issued, with copies for a backup of the computer system. The computer system will keep information on the name of the person/company using the landfill, its vehicle description, size of the load, type of material being disposed, date, time, etc.

Johnny F. Smith Truck & Dragline Services, Inc., Construction/Demolition-Debris Landfall will submit annual reports to the administrative authority indicating quantities and types of solid waste (expressed in wet-weight tons per year), received from in-state generators and from out-of state generators, during the reporting period. All calculations used to determine the amounts of solid waste received for processing or disposal during the annual reporting period will be submitted to the administrative authority. A copy of the Solid Waste Disposer Annual Report to be used for this reporting is included as Exhibit

25. These reports will be submitted on the forms required by the Solid Waste Division.

The reporting period for the Johnny F. Smith Truck & Dragline Services, Inc., Construction/Demolition-Debris Landfill annual report will be July 1 through June 30, and will be terminated upon closure of the facility. The annual report will be submitted to the administrative authority by August 1 of each reporting year. An annual report will be provided specifically for this site.

These records shall be maintained for the life of the facility and kept on file for at least three years after closure of the Landfill.

Johnny F. Smith Truck & Dragline Services, Inc., Construction/Demolition -Debris Landfill will maintain records of the transporters transporting waste for processing or disposal at the facility. The records will include the date of receipt of shipments of waste and the transporter's solid waste identification number issued by the Solid Waste Division.

In addition to the above, copies of the following records will be kept on site: the current Louisiana Solid Waste Rules and Regulations, the permit, the permit application and permit modifications.

NEW RESPONSE

The quantity (wet-weight tonnage) of the solid waste entering the site will be based on a truck scale currently active at the site. In the event that the truck scale is out of service for any reason, wet-weight tonnage will be estimated based on volumes as described in the prior response to 521.B.1d included in this application. Any waste items determined to be unacceptable will be rejected and a log of all rejected loads/items will be maintained at the facility.

Details regarding all incoming loads are recorded using a computerized database equipped with back-up capabilities that minimize the chance of computer accidents/losses. The computer generated load ticket provided to drivers, as

well as the landfill's internal computer system, records data including the name of the hauler, vehicle description, size of load, type of material, date, time and weather. Copies of a load ticket, rejected load journal, and daily ticket report showing the information described herein have been provided in Exhibit 19. Also included in Exhibit 19 are copies of an Incident Documentation Form and Preventative Maintenance/Visual Inspection Form. These forms provide for the documentation of a host of information, including but not limited to equipment breakdowns, accidents/injuries, and visits by regulatory and/or law enforcement agencies.

Slidell Landfill will submit annual reports to the administrative authority indicating quantities and types of solid waste (expressed in wet-weight tons per year) received from in-state and out-of-state generators during the reporting period. Any calculations used to determine the amounts of solid waste received will be available to the administrative authority. A copy of the Annual Report covering the period of July, 2003 through June, 2004 has been provided as Exhibit 25. Future reports will continue to be provided on the forms required by the Department.

The reporting period for the Slidell Landfill Annual Report will be July 1 through June 30 and will be terminated only upon closure of the facility. The Annual Report will be submitted to the administrative authority by August 1 of each year. Records will be maintained for the life of the facility and for at least three years subsequent to closure of the facility.

In addition to the information previously discussed, copies of the current Louisiana Solid Waste Rules and Regulations, the Solid Waste Permit, the permit application, and permit modifications will be maintained on-site. The facility will employee adequate personnel as necessary to achieve all operational requirements of the facility.

b. an estimate of the minimum personnel, listed by general job classification, required to operate the facility; and

RESPONSE

At a minimum, the following personnel, along with job classification, will be on-site during operations:

1	-	*Office Personnel (Record Loads)*
1	-	*Dozer/Backhoe Operator (Spotting Trucks and Pushing Debris)*

c. maximum days of operation per week and per facility operating day (maximum hours of operation within a 24-hour period).

RESPONSE

Operating Schedule: the proposed Landfill will accept solid waste from 8:00 am to 4:00 p.m. (eight (8) hours within a 24-hour period) Monday through Friday. Any changes in our operation hours will be requested to LDEQ/OSHW prior to changing these times.

NEW RESPONSE

Operating Schedule: the proposed Landfill will accept solid waste from 7:30 am to 4:30 p.m. (nine (9) hours within a 24-hour period) Monday through Friday. Any changes in operation hours will be requested from LDEQ/Office of Environmental Services prior to changing these times.

2. Administrative procedures for Type II facilities shall include the number of facility operators certified by the Louisiana Solid Waste Operator Certification and Training Program (R.S.37:3151 et seq.).

RESPONSE

One operator certified by the Louisiana Solid Waste Operator Certification and Training Program will be assigned to the Johnny F. Smith Truck & Dragline Services, Inc., Construction/Demolition-Debris Landfill. The current certified operator assigned to the site is Willis A. Palmer. A copy of Mr. Palmer's Solid Waste Operator Certificate is included as Exhibit 25.

NEW RESPONSE

One operator certified by the Louisiana Solid Waste Operator Certification and Training Program will be assigned to Slidell Landfill, L.L.C. Construction/Demolition-Debris Landfill. The current certified operator assigned to the site is Jerry H. McCain, Jr. A copy of Mr. McCain's Solid Waste Operator Certificate is included as Exhibit 25. The Operator's certificate will be prominently displayed at the facility.

PART II PERMIT APPLICATION
H. FACILITY OPERATIONAL PLANS

H. FACILITY OPERATION PLANS. Standards governing facility operational plans are contained in LAC 33:VII.711.1D (Type I and II landfills), LAC 33:VII.713.D (Type I and II surface impoundments), LAC 33:VII.715.D (Type I and II landfarms), LAC 33:VII.717.G (Type I-A and II-A facilities), LAC 33:VII.721.C (Type III construction and demolition debris and woodwaste landfills), LAC 33:VII.723.C (Type III composting facilities), and LAC 33:VII.725.C (Type III separation facilities).

1. The following information on operational plans is required for all facilities:

   a. types of waste (including chemical, physical, and biological characteristics of industrial wastes generated on-site), maximum quantities of wastes per year, and sources of waste to be processed or disposed of at the facility;

RESPONSE

The proposed Facility will only accept construction/demolition debris wastes as defined in LAC 33:VII.115. The generating sources for this solid waste will be various state and/or municipal construction/demolition projects and residential/commercial properties located in Orleans Parish, St. Tammany Parish and Jefferson Parish.

The proposed Facility expects to receive a maximum of 135,000 tons of solid waste per year at full capacity and all data will be recorded and kept at the facility. The estimated per week maximum to be received at the landfill is 2600 tons.

The proposed Facility will not accept the following types of waste: hazardous, liquid, infectious, residential, industrial, commercial, friable asbestos, or putrescible wastes as defined in LAC 33:VII.115. The receipt of non-acceptable wastes listed will be prohibited and prevented.

NEW RESPONSE

The proposed Facility will only accept construction/demolition debris wastes as defined in LAC 33:VII.115, including woodwaste. The generating sources for this solid waste will be various state and/or municipal construction/demolition projects and residential/ commercial properties.

The proposed Facility expects to receive a maximum of approximately 900,000 tons of solid waste per year at full capacity and all data will be recorded and kept at the facility. The estimated per week maximum to be received at the landfill is 25,000 tons. This tonnage would be expected to decrease significantly as post-hurricane needs decrease.

The proposed Facility will not accept the following types of waste: hazardous, liquid, infectious, residential, industrial, commercial, friable asbestos, or putrescible wastes as defined in LAC 33:VII.115. The receipt of non-acceptable wastes listed will be prohibited and prevented. A maximum of 5% by volume of paper waste associated with construction/demolition debris will be disposed of at the facility per year.

b. waste-handling procedures from entry to final disposition, which could include shipment of recovered materials to a user;

RESPONSE

Procedures for handling waste have been included as Exhibit 26. Exhibit 27 is a flow chart depicting the sequence of the solid waste landfilling.

Open burning will not be practiced unless authorization is first obtained from the administrative authority and any other applicable federal, state, and local authorities.

Scavenging shall be prevented at the site.

NEW RESPONSE

Procedures for handling waste have been included as Exhibit 26. Exhibit 27 is a flow chart depicting the sequence of the solid waste landfilling.

Open burning will not be practiced unless authorization is first obtained from the administrative authority and any other applicable federal, state, and local authorities.

Scavenging/and salvaging shall be prevented at the site.

Tires will be stored on-site as required by LAC 33:VII.10519 and removed by a registered transporter to an authorized site. White goods will be removed every 30 days by a registered transporter to an authorized site. All other unauthorized waste will be stored as required by LAC 33:VII.703 for a maximum of seven days. Records will be maintained of all waste removal as required by this permit and the regulations.

c. minimum equipment to be furnished at the facility;

RESPONSE

The operation will have as a minimum, three trash compactors, one backhoe, and one dozer. Sufficient equipment will be provided and maintained at this facility to meet its operational needs. The owner has additional equipment that will be used as needed.

d. plan to segregate wastes, if applicable;

RESPONSE

All incoming waste will be inspected and any materials which are determined to be unacceptable will not be accepted at the landfill.

If waste determined not acceptable is received at the landfill the waste will be removed from the facility at least every seven days. Storage of this waste will be in closed containers that prevent vector and odor problems. The facility will maintain a log of dates and volumes of waste removed from the facility.

NEW RESPONSE

All incoming waste will be inspected and any materials which are determined to be unacceptable will not be accepted at the landfill.

If waste determined not acceptable is received at the landfill the waste will be removed from the facility at least every seven days. Storage of this waste will be in closed containers that prevent access by rodents and insects, minimize the escape of odors, and keep out water. The facility will maintain a log of dates and volumes of waste removed from the facility.

e. procedures planned in case of breakdowns, inclement weather, and other abnormal conditions (including detailed plans for wet-weather access and operations);

RESPONSE

The Facility has adequate backup equipment that will be furnished by the owner. The owner has other operations that use equipment and have the necessary repair personnel to maintain this operation. This operation and additional equipment is adjacent to the landfill operation. Inclement weather should not affect the operation. The road into the site past the controlled entrance is white clay with a stone cover for additional traction. Pumps will allow the rain water that falls into the landfill to be discharged under the LDEQ water discharge permit. All roads to the site are concrete surface highway type roads (I-10, I-10 service road and City Parish main roads) up to the property.

f. procedures, equipment, and contingency plans for protecting employees and the general public from accidents, fires, explosions, etc., and provisions for emergency care should an accident occur (including proximity to a hospital, fire and emergency services, and training programs):

RESPONSE

In order to properly protect employees from accidents, and provide emergency care should an accident occur, proper authorities will be notified via the 911 emergency response system. First aid supplies and fire extinguishers will be maintained in full working condition on-site. North Shore Regional Medical Center is located within approximately 5 miles and two fire stations are located within 3 miles of the proposed Landfill (See Exhibit 16). A letter from the

North Shore Regional Medical Center indicating that their facility can handle emergencies at the site is included as Exhibit 28. See Exhibit 17 for the Fire and Safety Plan. The Fire and Safety Plan will be filed with the administrative authority, local fire department, and closest hospital or clinic. The plans will be updated annually or when implementation demonstrates the need for revision.

NEW RESPONSE

In order to properly protect employees from accidents, and provide emergency care should an accident occur, proper authorities will be notified via the 911 emergency response system. First aid supplies and fire extinguishers will be maintained in full working condition on-site. The fire extinguishers are located in the administrative offices of the landfill, in the equipment maintenance building, and on all heavy equipment utilized in the landfill. North Shore Regional Medical Center is located within approximately 5 miles and two fire stations are located within 3 miles of the Landfill (See Exhibit 16). A letter from the North Shore Regional Medical Center and the local fire department indicating that their facilities can handle emergencies at the site has been included in Exhibit 28. See Exhibit 17 for a copy of the Fire and Safety Plan and evacuation routes for the facility.

Training will be conducted at least annually at the facility and the Fire and Safety Plan will be filed with the administrative authority, local fire department, and closest hospital or clinic. The plans will be updated annually or when implementation demonstrates the need for revision.

g. provisions for controlling vectors, dust, litter and odors.

RESPONSE

Odor and vector problems should be minimal as no putrescible wastes are accepted or deposited on site. Odor control measures shall be implemented throughout facility operations with the use of cover material as required.

Dust will be controlled as needed by the application of water to traveled areas via sprinkler systems and a water truck as necessary. Litter control should also be minimal

due to the nature of the construction/demolition-debris and haulers must have covers on their loads. However, Landfill personnel will patrol the site daily and collect and properly dispose of any litter which may accumulate.

2. The following information on operational plans is required for Type I and II facilities:

a. a comprehensive operational plan describing the total operation, including (but not limited to) inspection of incoming waste to ensure that only permitted wastes are accepted (Type II landfills must provide a plan for random inspection of incoming waste loads to ensure that hazardous wastes or regulated PCB wastes are not disposed of in the facility); traffic control; support facilities; equipment operation; personnel involvement; and day-to-day activities. A quality assurance/quality control (QA/QC) plan shall be provided for facilities receiving industrial waste; domestic-sewage sludge; incinerator ash; friable asbestos; nonhazardous petroleum-contaminated media; and debris generated from underground storage tanks (UST), corrective action, or other special wastes as determined by the administrative authority. The QA/QC plan shall include (but shall not be limited to) the necessary methodologies; analytical personnel; preacceptance and delivery restrictions; and appropriate responsibilities of the generator, transporter, processor, and disposer. The QA/QC plan shall ensure that only permitted, non-hazardous wastes are accepted;

RESPONSE
Not applicable - the proposed Landfill is a Type III facility.

b. salvaging procedures and control, if applicable; and

RESPONSE
Not applicable - the proposed Landfill is a Type III facility.

c. scavenging control

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

3. The following information on operational plans is required for Type I and II landfarms:

a. items to be submitted regardless of land use:

i. a detailed analysis of waste, including (but not limited to pH, phosphorous, nitrogen, potassium, sodium, calcium, magnesium, sodium-adsorption ratio, and total metals (as listed in LAC 33:VII.715.D.3.b);

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. soil classification, cation-exchange capacity, organic matter, content in soil, soil pH, nitrogen, phosphorus, metals (as listed in LAC 33:VII.715.D.3.b), salts, sodium, calcium, magnesium, sodium-adsorption ratio, and PCB concentrations of the treatment zone;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iii. annual application rate (dry tons per acre) and weekly hydraulic loading (inches per acre); and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iv. an evaluation of the potential for nitrogen to enter the groundwater.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. items to be submitted in order for landfarms to be used for food-chain cropland:

I. a description of the pathogens-reduction method for seepage, domestic sewage sludges, and other sludges subject to pathogen production;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. crops to be grown and the dates for planting;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iii. PCB concentrations in waste;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

iv. annual application rates of cadmium and PCBs; and

RESPONSE

Not applicable the proposed Landfill is a Type III facility.

v. cumulative applications of cadmium and PCBs.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. items to be submitted for landfarms to be used for nonfood-chain purposes:

i. description of the pathogen-reduction method in septage, domestic sewage sludges, and other sludges subject to pathogen production; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

ii. description of control of public and livestock access.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

4. The following information on operational plans is required for Type I-A and II-A incinerator waste-handling facilities and refuse-derived energy facilities:

a. a description of the method used to handle process waters and other water discharges which are subject to NPDES permit and state water discharge permit requirements and regulations; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. a plan for the disposal and periodic testing of ash (all ash and residue must be disposed of in permitted facility).

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

5. The following information on operational plans is required for Type I-A and II-A refuse-derived fuel facilities and Type III separation and composing facilities:

a. a description of the testing to be performed on the fuel or compost; and

RESPONSE

Not applicable - the proposed Landfill is a Type III construction/demolition-debris facility.

b. a description of the uses for and the types of fuel/compost to be produced.

RESPONSE

Not applicable - the proposed Landfill is a Type III construction/demolition debris facility.

6. The operational plans for Type I-A and II-A refuse-derived fuel facilities and Type III separation and composting facilities must include a description of marketing procedures and control.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility for construction and demolition debris.

7. The operational plans for Type I and II facilities receiving waste with a potential to produce gases must include a comprehensive air monitoring plan.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
I. IMPLEMENTATION PLAN

I. **IMPLEMENTATION PLAN.** Standards governing implementation plans are contained in LAC 33:VII.709.D (Type I and II facilities), LAC 33:VII.717.H (Type I-A and II-A facilities), and LAC 33:VII.719.E (Type III facilities).

1. The implementation plans for all facilities must include the following:

   a. a construction schedule for existing facilities which shall include beginning and ending time-frames and time-frames for the installation of all major features such as monitoring wells and liners. (Time-frames must be specified in days, with day one being the date of standard permit issuance); and

RESPONSE

The proposed construction/demolition debris Landfill is going to use an old clay mining pit for its operation. These two pits are already in place and they are ready to receive waste. The support activity for this proposed operation is already in place. The wastewater permit is already in place.

Water is currently in the 9-acre tract (Cell No. 1) and will be pumped out to the drainage ditch located along the eastern side of the property. The base of the 9 acre tract will be allowed to dry out and then the earthen area between the two cells will be excavated to the proposed contour depths shown on Exhibit 15. It is estimated that the 9-acre tract of land can be drained and prepared to be used as a landfill within 2 to 3 months of draining the water.

Upon issuance of this permit, the old pit will continue to be filled until the pit is completely filled. Once the pit is completely filled, the pit will be closed as per LDEQ requirements.

Gates, office, maintenance facilities, and equipment are all in place and procedures are ready to start this operation as soon as it is permitted.

NEW RESPONSE

The currently operating construction/demolition debris Landfill is using two old clay mining pits for its operation. These two pits are already in place and both cells are currently receiving waste. The support activity for this operation is already in place. The stormwater discharge permit is also already in place.

The existing 20.5 acre old landfill cell located south of cell Nos. 1 and 2 is ready to receive material immediately upon approval of this permit modification. Gates, office, maintenance facilities, and equipment are all in place at this time.

Earthen levees have been in place for several years on the north, east, and west sides of currently active cells 1 and 2. Levee repairs and reconstruction of levees along the east, west, and south sides of the Old Landfill Cell have been in progress for the past several months. Completion of these activities is anticipated within the next 30 days. Upon completion, cell 1, cell 2, and the Old Slidell Landfill will be surrounded by levees constructed to an elevation of approximately 9.0 feet mean sea level. The levees serve to prevent the intrusion of offsite water as well as insure that no offsite discharges of stormwater or contact water occurs except through the permitted outfall for the landfill.

b. details on phased implementation if any proposed facility is to be constructed in phases.

RESPONSE

The 16.5 acre pit is the first one that will be used. The pit will be used in sections and covered as required. The 9 acre pit will be used after the 16.5 acre pit is filled. The pit will be used in sections and covered as required.

NEW RESPONSE

The 18.5 acre pit (Cell No. 2) and the 9 acre pit (Cell No. 1) are the first areas that will be filled. Once the 18.5 acre and 9 acre pits have been filled to a level compatible with the adjacent 20.5 acre landfill cell, material will be placed in the 20.5 acre portion of the landfill. All active areas will be covered as required.

2. The implementation plans for Type I and II facilities must included a plan for closing and upgrading existing operating areas if the application is for expansion of a facility or construction of a replacement facility.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
J. FACILITY CLOSURE

J. **FACILITY CLOSURE.** Standards governing facility closure are contained in LAC 33:VII.711.E (Type I and II landfills), LAC 33:VII.713.E (Type I and II surface impoundments), LAC 33:VII.715.E (Type I and II landfarms), LAC 33.VII.717.I (Type I-A and II-A facilities) LAC 33:VII.721.D (construction and demolition debris and woodwaste landfills), LAC 33:VII.723.D (Type III composting facilities), and LAC 33:VII.725.D (Type III separation facilities).

1. The closure plan for all facilities must include the following:

   a. the date of final closure:

RESPONSE

The final date for the proposed Johnny F. Smith Truck and Dragline Service, Inc., is estimated at 20 years from the date of issuance of the standard operating permit, or the date the site has been filled to capacity, whichever comes first. This does not preclude closing of the landfill either at an earlier or later date due to economic conditions.

NEW RESPONSE

The final date for operation of the Slidell Landfill is estimated to be December, 2016. This does not preclude closing the landfill at an earlier or later date based on actual material disposal rates, which will be heavily influenced by hurricane-related disposal needs over the next few months and years.

   b. the method to be used and steps necessary for closing the facility; and

RESPONSE

Pre-Closure

The administrative authority will be notified in writing at least 90 days before closure or intent to close any individual units within the facility. The notification will include the following information: date of planned closure, changes, if any, requested in the approved closure plan, and closure schedule and estimated costs.

The proposed Landfill will be partially closed as filling of the facility progresses. Because of the filing sequence, phased closure will occur as different areas are filled to capacity. Final cover shall be applied within 30 days after final grades are reached in each particular pit unit or area of the landfill. Slidell Landfill, L.L.C. (formerly Johnny F. Smith Truck & Dragline Service, Inc.,) understands this deadline may be extended by the administrative authority if necessary due to inclement weather or other circumstances. Standing water will be removed. The runoff-diversion system shall be maintained and modified (if needed) until the final cover is installed to prevent overflow of the landfill. An insect and rodent inspection will be performed and documented before the installation of final cover, and extermination measures, if needed, will be provided. Waste will be machine compacted and graded before capping.

Closure

Final cover shall consist of a minimum of 24" of silty clay and 6" of topsoil for supporting vegetative growth; however, a combination of clay and synthetic material approved by the administrative authority may also be used as final cover. After the closure inspection and approval, the cover will be vegetated. The side slopes will be no steeper than 3(H):1(V) and the cover will have a minimum of a 4% crown slope (see Exhibit 21).

c. the estimated cost of closure of the facility, based on the cost of hiring a third party to close the facility at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive.

RESPONSE

The estimated cost for the closure and post closure of the 25.5 acre landfill is $388,470. This will give a two foot cap of white clay that is present on site with six inch top soil that will be brought on-site. The side slope will be no steeper than 3(H):1(V) and will have a minimum of a four percent slope on the top of the final cap. An updated closure schedule and cost estimate will be submitted along with the notification of the intent to close. A breakdown of

the closure costs are included in Exhibit 29.

NEW RESPONSE

The estimated cost for the closure and post closure of the ±48 acre landfill is $1,045,710. This will provide a two foot cap of clay, a portion of which is present on site, and six inches of top soil that will be imported from offsite. The side slopes will be no steeper than 3(H):1(V) and will have a minimum of a four percent slope on the top of the final cap. An updated closure schedule and cost estimate will be submitted along with the notification of the intent to close. A breakdown of the closure costs and associated calculations are included in Exhibit 29. These costs are based on performance by a third party at the point in the facility's operating life when the extent and manner of it's operation would render closure the most expensive.

2. The closure plan for Type I and II landfills and surface impoundments must include:

a. a description of the final cover and methods and procedures used to install the cover;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. an estimate of the largest area of the facility ever requiring a final cover at any time during the active life;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. an estimate of the maximum inventory of solid waste ever on-site over the active life of the facility; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

d. a schedule for completing all activities necessary for closure.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

3. The closure plan for all Type I and II facilities and Type III woodwaste and construction/demolition debris facilities shall include the following:

a. the sequence of final closure of each unit of the facility, as applicable;

RESPONSE

The existing portion of the proposed Landfill will be partially closed as filling of the pits progresses. Because of the availability of on-site cover material and the filling sequence, phased closure will occur as pits are filled to capacity.

NEW RESPONSE

Cells 1 and 2 will be filled to elevations compatible with the current top elevation of the Old Landfill Cell. It is anticipated that the landfill will then be filled to capacity using the "moving face" method, beginning on the southerly end of the landfill and progressing in a northerly direction. Interim cover will be maintained on all inactive portions of the landfill and the size of the active portion of the landfill that is actually receiving waste will be minimized to the extent possible at all times.

b. a drawing showing final contours of the facility; and

RESPONSE

A site plan showing the proposal final contours is included in Exhibit 21. Cross-sections of the proposed final contours are included as Exhibit 21B.

NEW RESPONSE

No changes to permit text. Exhibits 21 and 21B have been modified to show the modified landfill footprint, final contours and cross-sections.

c. a copy of the document that will be filed upon closure of the facility with the official parish record keeper indicating the location and use of the property for solid waste disposal, unless the closure plan specifies a clean closure.

RESPONSE

Exhibit 30 is a copy of the Conveyance Records of St. Tammany Parish Clerk of Court upon final closure of the Landfill.

NEW RESPONSE

Exhibit 30 is a copy of the Conveyance Records of St. Tammany Parish Clerk of Court upon final closure of the Landfill.

PART II PERMIT APPLICATION
K. FACILITY POST-CLOSURE

K. FACILITY POST-CLOSURE. Standards governing post-closure requirements are contained in LAC 33:VII.711.F (Type I and II landfills), LAC 33:VII.713.F (Type I and Ii surface impoundments), LAC 33:VII.715.F (Type I and II landfarms), and LAC 33:VII.721.E (Type III construction and demolition debris and woodwaste landfills).

1. The post-closure plan for all facilities must include the following:

   a. specification of the long-term use of the facility after closure, as anticipated; and

RESPONSE

Johnny F. Smith Truck & Dragline Service, Inc., will maintain the integrity of the cap for no less than three years after closure. Additional grading and filling will be performed to maintain the final cap, to assure a minimum top slop of four percent and to prevent the accumulation of standing water. Annual reports concerning the integrity of the cap for a period of three years after closure will be submitted to LDEQ. The long term use of the facility after closure is anticipated to be a parking lot, storage area for equipment rental and or other commercial applications.

   b. the cost of conducting post closure of the facility, based on the estimated cost of hiring a third party to conduct post-closure activities in accordance with the closure plan.

RESPONSE

It is estimated that post-closure activities will be minimal, if any, and will not exceed a cost of $5,000 per year for the required three (3) years cap integrity maintenance period (maximum of $15,000). Annual reports concerning the integrity of the cap will be submitted to the administrative authority for a period of three years after closure. A breakdown of the estimated post closure care/maintenance costs are included in Exhibit 31.

NEW RESPONSE

It is estimated that post-closure activities will be minimal and will not exceed a cost of $15,000 per year for the required three (3) year cap integrity maintenance period (maximum of $45,000). Annual reports concerning the integrity of the cap will be submitted to the administrative authority for a period of three years after closure. A breakdown of the estimated post closure care/maintenance costs is included in Exhibit 31. These costs are based upon performance by a third party.

2. The post-closure plan for Type I and II facilities must include the following:

a. the method for conducting post-closure activities, including a description of the monitoring and maintenance activities and the frequency at which they will be performed:

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

b. the method for abandonment of monitoring system , leachate collection systems, gas-collection systems, etc.;

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

c. measures planned to ensure public safety, including access control and gas control; and

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

d. a description of the planned uses of the facility during the post-closure period.

RESPONSE

Not applicable - the proposed Landfill is a Type III facility.

PART II PERMIT APPLICATION
L. FINANCIAL RESPONSIBILITY

L. **FINANCIAL RESPONSIBILITY.** Standards governing financial responsibility are contained in LAC 33:VII.727. A section documenting financial responsibility according to LAC 33:VII.727 which contains the following information, must be included for all facilities:

1. The name and address of the person who currently owns the land and the name and address of the person who will own the land if the standard permit is granted (if different from the permit holder, provide a copy of the lease or document which evidences the permit holder's authority to occupy the property); or

RESPONSE

Johnny F. Smith is the owner of the land and will be the operator of this construction/debris landfill. The current address for Mr. Smith is 310 Howze Beach Road, Slidell, LA 70461. See Exhibit 32.

NEW RESPONSE

Ms. Janice Smith Stumpf and the Johnny F. Smith Testamentary Trust are the owners of the land and will be the operators of this construction/debris landfill. The current address for Ms. Stumpf is 310 Howze Beach Road, Slidell, LA 70461. Ms. Stumpf has granted permission for landfill activities to be performed on the property. See Exhibit 32.

2. The name of the agency or other public body that is requesting the standard permit; or, if the agency is a public corporation, its published annual report; or, if otherwise, the names of the principal owners, stockholders, general partners, or officers;

RESPONSE

Johnny F. Smith is the owner of the land and will be the operator of this construction/debris landfill. The current address for Mr. Smith is 310 Howze Beach Road, Slidell, LA 70461. See Exhibit 32.

NEW RESPONSE

Slidell Landfill, L.L.C. is the operator of this construction and demolition debris landfill. Slidell Landfill, L.L.C., is owned by Ms. Janice Smith Stumpf and the Johnny F. Smith Testamentary Trust. The current address for Ms. Stumpf is 310 Howze Beach Road, Slidell, LA 70461.

3. Evidence of liability coverage, including

a. personal injury, employees, and the public (coverage, carriers, and any exclusions or limitations);

b. property damage (coverage and carrier);

c. environmental risks; and

RESPONSE

Included as Exhibit 33 is a copy of Johnny F. Smith Truck & Dragline Service, Inc., insurance information.

NEW RESPONSE

Slidell Landfill's insurance coverage includes a Pollution Legal Liability Select Policy issued by American International Specialty Lines Insurance Company and an Environmental Impairment Liability Policy. Verification of coverage has been provided in Exhibit 33.

4. Evidence of financial assurance mechanism for closure and/or post-closure care;

RESPONSE

Included as Exhibit 34 is a copy of Johnny F. Smith Truck & Dragline Services, Inc., financial statement.

NEW RESPONSE

A Letter of Credit will be used by Slidell Landfill for the financial assurance mechanism. The Letter of Credit has been provided in Exhibit 34.

PART II PERMIT APPLICATION
M. SPECIAL REQUIREMENTS

M. SPECIAL REQUIREMENTS

The administrative authority may require additional information for special process or systems and for supplementary environmental analysis.

RESPONSE
Not applicable

NEW RESPONSE
This requirement is acknowledged and understood.

SECTION 4
PART III PERMIT APPLICATION
(IT QUESTIONS RESPONSE)

523. PART III: ADDITIONAL SUPPLEMENTARY INFORMATION

The following supplementary information is required for all solid waste processing and disposal facilities. All responses and exhibits must be identified in the following sequence to facilitate the evaluation:

33:VII.523.A Address the following categories in detail:

NEW RESPONSE

The response to LAC 33:VII. 523 (IT Questions response) has been provided as Exhibit 37.